

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-10104-PBS
)	
VLADISLAV KLYUSHIN,)	
)	
Defendant.)	
_____)	

[PROPOSED] PROTECTIVE ORDER

Upon consideration of the government's assented to Motion for a Protective Order, it is hereby **ORDERED** that:

1) The discovery materials produced by the government in this case may be used by the defendant, defendant's counsel and any employees or agents of defendant's counsel solely in the defense of this case and for no other purpose and in connection with no other proceeding.

2) Defendant's counsel and defendant shall not disclose any discovery materials, directly or indirectly, to any other person except those assisting the defense, persons who are interviewed as potential witnesses, potential experts, or other authorized persons, during the course of the investigation and defense of this case.

3) Except as set forth below, copies of discovery materials may only be shown to, and not given to, potential witnesses. Defendant's counsel shall redact any personally identifying information—including, but not limited to, dates of birth, home addresses, names of minor children, and financial account numbers of third parties ("Confidential Information")—from the copies of materials shown to such witnesses. However, if the materials shown to a particular witness contain Confidential Information of that particular witness, such Confidential Information need not be redacted from the materials shown to or played for that witness. In the

case of any expert witness, defendant's counsel is permitted to disclose unredacted discovery materials to said expert witness so long as the expert witness (a) has signed the attached Agreement To Be Bound By Order and this signed document has been filed with the Court as set forth in Paragraph 4 below, and (b) returns all discovery materials, and any copies thereof, to defendant's counsel at the conclusion of the case.

4) When disclosing discovery materials as set forth herein, defendant's counsel must inform the recipient that the materials are provided subject to the terms of this Protective Order and that the recipient must comply with the terms of this Protective Order. Each potential witness to whom such disclosure is made shall sign the attached Agreement To Be Bound By Order, and defendant's counsel shall file such an endorsed copy with the Court. Such filings may be made ex parte and under seal.

5) Defendant's counsel shall inform the defendant of the provisions of this Protective Order, and direct him not to disclose or use any information contained in the government's discovery in violation of this Protective Order.

6) All discovery materials shall be destroyed by defense counsel or returned to counsel for the government at the conclusion of this case.

Nothing contained in the Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.

DATED: _____

THE HONORABLE MARIANNE B. BOWLER
UNITED STATES MAGISTRATE JUDGE

AGREEMENT TO BE BOUND BY ORDER

I hereby acknowledge that I have read the contents of the above protective order entered in *United States v. Vladislav Klyushin*, 21-CR-10104-PBS, and have had the terms explained to me. I agree that the order applies to me, that I am bound by its terms, and that I shall comply with its terms.

NAME:

DATE